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August 2, 2014

VIA ECF

Honorable Valerie E. Caproni, USDJ
United States District Court for the
Southern District of New York
40 Foley Square/Courtroom 443
New York, New York 10007

RE: New Jersey Sports Productions, Inc. v. Groupe Yvon Michel, et. al.
Civil Action No.: 14-cv-3038

Dear Judge Caproni,

Friday evening the plaintiff and defendant Golden Boy Promotions, Inc. reached a settlement in this matter.

An Amended Complaint was due on Monday, August 4th. We had completed a draft of that Amended Complaint prior to the settlement.

However, as a result of the settlement the contours of the case have altered dramatically and the Amended Complaint which we had drafted is no longer appropriate or applicable.

We therefore request an adjournment of the due date for the Amended Complaint. We request a one week adjournment of that due date to Monday, August 11th. One of the

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many issues we need to consider is whether the settlement divests this Court of jurisdiction, an issue which cannot be determined over the weekend. In any case the Amended Complaint would have to be significantly restructured to meet the new circumstances.

Late on Friday afternoon after the contemplation of a possible settlement we reached out for counsel in this case. Defendant Golden Boy consented to the adjournment. Counsel for the other defendants could not reach their clients and therefore indicated they would take no position.

There have been no prior requests to adjourn the date set by the Court to the filing of the Amended Complaint.

We apologize for the lateness of the request for this adjournment. The settlement negotiations were very unexpected to us and were conducted in a very swift fashion.

Thank you for your consideration of this request

Very Truly Yours,

DINES AND ENGLISH, L.L.C.

BY: /s/ Patrick C. English
PATRICK C. ENGLISH

Cc: All Counsel (*Via ECF*)